

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re

THE GINGISS GROUP, INC., et al.,

Debtors.

ALFRED T. GIULIANO, Chapter 7 Trustee
for the estates of THE GINGISS GROUP,
INC., et al.,

Plaintiff,

vs.

SULMEYER KUPETZ,
A PROFESSIONAL CORPORATION,

Defendant.

Case No. LA 03-13364-(MFW)

(Jointly Administered)

Chapter 7

Adv. No. 06-50618 (KJC)

DEFENDANT'S MOTION TO WITHDRAW THE REFERENCE
TO THE BANKRUPTCY COURT

Pursuant to 28 U.S.C. § 157(d), defendant **SulmeyerKupetz**, A Professional Corporation ("Defendant"), by and through its undersigned counsel, hereby moves this Court ("Motion") for withdrawal of the reference to have the matter heard by the United States District Court for the District of Delaware. In support of its Motion, Defendant fully incorporates by reference its brief filed simultaneously with the Motion.

DATED: July 26, 2006

Respectfully submitted,

SULMEYERKUPETZ
A Professional Corporation

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ORDER WITHDRAWING REFERENCE

Upon the Motion of Defendant **SulmeyerKupetz** to Withdraw the Reference to the Bankruptcy Court (the "Motion"), and adequate notice having been given and no other further notice being necessary; and based upon the arguments and for cause shown, it is hereby

ORDERED that the Motion is GRANTED; and it is further

ORDERED that the reference of this adversary proceeding is withdrawn and further proceedings shall be conducted in the District Court.

SO ORDERED this _____ day of _____, 2006.

United States District Court Judge

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CERTIFICATE OF SERVICE

I, Susan E. Kaufman, Esquire certify that I caused one true and correct copy of the within Defendant's Motion to Withdraw the Reference to the Bankruptcy Court, Defendant's Motion for A Determination of Core Status and Opening Brief in Support of Defendants' Motion to Withdraw the Reference to the Bankruptcy Court to be sent on July 26, 2006 in the manner indicated to the following:

Via Fax and Hand Delivery

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Dated: July 26, 2006

TRANSMITTAL SHEET FOR WITHDRAWAL OF REFERENCE TO U.S.

DISTRICT COURT FOR THE DISTRICT OF DELAWARE

Adversary Case: 06-50618 (MFW)

Related BK Case: 03-13364 (MFW)

Deputy Clerk Transferring Case: **Sherry A. Johnson**

Case Type: Motion For Withdraw of Reference

Parties: **Alfred T. Giuliano, Chapter 7 Trustee for the estates of
The Gingiss Group, Inc., et al, -v- Sulmeyer Kupetz, A
Professional Corporation**

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